

SWIDLER BERLIN LLP  
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*Attorneys for Westwood Associates, Inc. and  
Sanders Lead Co., Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	:	<b>Chapter 11</b>
	:	
<b>DELPHI CORPORATION, <u>et al.</u>,</b>	:	<b>Case No. 05-44481 (RDD)</b>
	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
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**VERIFIED STATEMENT OF SWIDLER BERLIN LLP  
PURSUANT TO BANKRUPTCY RULE 2019**

Swidler Berlin LLP ("Swidler") hereby makes this statement pursuant to Rule 2019 of  
the Federal Rules of Bankruptcy Procedure:

- Swidler represents the following creditors in the above-captioned cases:

<u>Name</u>	<u>Address</u>
Westwood Associates, Inc. ("Westwood")	612 Wheelers Farms Road Merritt Corporate Woods Milford, CT 06460
Sanders Lead Co., Inc. ("Sanders")	One Sanders Road Troy, AL 36081

- Swidler represents each of these entities individually; the entities are separate and  
independent of each other and they have no corporate affiliation with each other; the entities

listed above are not members in any official committees found in these cases and do not constitute a committee of any kind. Other than retainer or engagement letters, Swidler has no written contracts with either of these entities.

3. Westwood had been a client of Swidler's with respect to another, unrelated matter prior to the time the above-captioned Debtors commenced their cases. Westwood retained Swidler as its bankruptcy counsel in this matter shortly after the petition date. Westwood is fully aware of Swidler's representation of Sanders in these cases and has consented to Swidler's concurrent representation of Sanders.

4. Westwood is a sole-source supplier of certain electronic components to the Debtors and has supplied such products for many years. Westwood holds pre-petition claims and reclamation claims, and is entitled to the payment of administrative expenses, arising out of its delivery of such goods to the Debtors both prior to and following the petition date. Westwood's claims against the Debtors, which have not been finally determined but which may exceed \$2,000,000, arose in the ordinary course of Westwood's long-standing supplier relationship with the Debtors.

5. Sanders was an established client of Swidler's with respect to other, unrelated matters prior to the time the above-captioned Debtors commenced their cases. Sanders retained Swidler as its bankruptcy counsel in this matter shortly after the petition date. Sanders is fully aware of Swidler's representation of Westwood in these cases and has consented to Swidler's concurrent representation of Westwood.

6. Sanders is a supplier of finished lead product and related services to the Debtors and has supplied same for several years. Sanders holds pre-petition claims and reclamation claims, and is entitled to the payment of administrative expenses, arising out of its delivery of

such goods and services to the Debtors both prior to and following the petition date. Sanders' claims against the Debtors, which have not been finally determined but which may exceed \$200,000, arose in the ordinary course of Sanders' supplier relationship with the Debtors.

7. Upon information and belief, Swidler does not hold any claims against, or equity interests in, any of the Debtors.

8. Swidler reserves the right to supplement or amend this statement at any time in the future.

9. Swidler makes this statement solely for disclosure purposes pursuant to Rule 2019, and nothing herein is, or should be construed as, an admission, acknowledgement, or waiver by Westwood or Sanders.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 20 day of October, 2005 in Washington, D.C.

SWIDLER BERLIN LLP

By: 

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*Attorneys for Westwood Associates, Inc. and  
Sanders Lead Co., Inc.*


**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20 day of October, 2005, I caused a true and correct copy of the foregoing Verified Statement of Swidler Berlin LLP Pursuant to Bankruptcy Rule 2019 to be served via first class mail, postage prepaid, on the following:

John William Butler, Jr., Esquire  
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Debra O. Fullem, Senior Legal Assistant  
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